

8

MIED ProSe 1 (Rev 5/16) Complaint for a Civil Case

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

Willie JAMES Ellis

Case: 2:17-cv-13852
Judge: Michelson, Laurie J
MJ: Davis, Stephanie Dawkins
Filed: 11-29-2017 At 04:01 PM
CMP WILLIE JAMES ELLIS V PROSPECT A
IRPORT SERVICES, ET AL (LGO)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: ☐ Yes ☐ No
(check one)

v.

- A. PROSPECT AIRPORT SERVICES.
- B. STATE OF MICH. UNEMPLOYMENT AGENCY.
- C. IC II II • WORKERS COMPENSATION
- D. MACARTHUR, MACARTHUR & ASSOCIATES.
- E. STALBURG, FISHER, WEBERMAN & VERROSI, PC.
- F. TEACHOUT SECURITY SOLUTIONS, INC.

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

I' BEGAN WORKING FOR THE DEFENDANT PROSPECT SERVICES ON 10-13-2015. I' WAS HIRED AS A LAYTOR / TRUCK DRIVER. I TOLD THE DEFENDANT OF MY PAST EMPLOYMENT AT THE AIRPORT WITH HUNTLEY USA SECURITY AT METRO AIRPORT. I INFORMED THEM OF MY DISABILITY FROM THAT EMPLOYMENT. ~~THEY~~ ^{WE} INFORMED THEM OF MY CAPABILITIES AS THEY TOLD ME WHAT THEY HAD OPEN. I' ACCEPTED EMPLOYMENT AS A TRUCK DRIVER AND THAT WAS IN MY PHYSICAL LIMITS. AFTER ABOUT THREE MONTHS OR LESS. THEY STARTED TO TREAT ME LIKE I' HAD DONE SOMETHING TO THEM AND SAID THEY WERE TRANSFERRING ME TO ANOTHER ~~DEPT~~ ^{WE} DEPARTMENT. THAT IS WHEN THEY CHANGED MY JOB INTO SOMETHING THEY KNEW I' COULDN'T DO, MANUAL LABOR. TO GET TO WHY THEY DID IT WAS BECAUSE OF, MACARTHUR & MACARTHUR WHO WERE THE ATTORNEYS IN THE PREVIOUS CASE. THEY WERE TRYING TO MAKE ME QUIT. CONTINUED ATTACHED SHEET

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

Willie J. Ellis Plaintiff(s),

Case No.

v.

Judicial Officer:

Prospect Air Port Services

STATE OF Mich. Defendant(s).

Continued Complaint For Civil Case

They continued to harass me and not let me do the job I was hired to do. So finally I got hurt trying to do the job they knew I was unable to do. That is when I found out what was really going on. Randy McArthur was coaching them what to do.

To The United District Court.

My Rights have been grossly violated by every one I named in this complaint. There is documents to support every thing I am ~~attaching~~^{attaching} accusing these people of as well as witnesses to all facts. The E.E.O.C. is trying to pass this to the Federal Court now like I wanted to do in the beginning. They told me they could not investigate this case. I have a letter of right to sue in the Federal Court. Once this Honorable Court see records and documents, MP3 Disk of the first trial I am sure this will be as clear as the church bell on Sunday morning to the court. All of these people including the State of Michigan Magistrates and Attorneys has violated Federal Laws. I pray this Honorable ^{Court} will allow this case to continue. I have documented proof of my allegations.

Demanding Jury Trial

Date: 11-29-2017

Willie James Ellis
Signature of Filer

Willie James Ellis
Printed Name of Filer

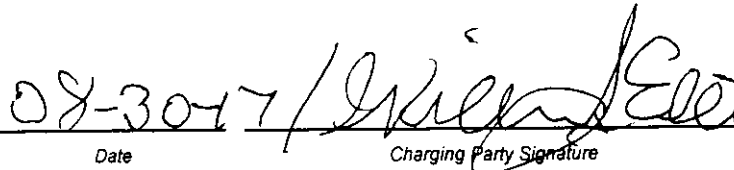
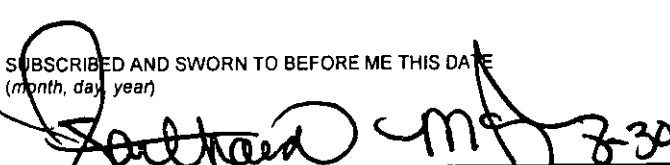
529 E. BROCKTON AVE
Address

Madison Heights Mich 48071
City, State, Zip Code

2487757-9943
Telephone Number

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented To: Agency(ies) Charge No(s): <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC 471-2017-03022	
Michigan Department Of Civil Rights and EEOC <i>State or local Agency, if any</i>			
Name (indicate Mr., Ms., Mrs.) Mr. Willie J. Ellis		Home Phone (Incl. Area Code) (248) 757-9943	Date of Birth 1944
Street Address City, State and ZIP Code 408 Forest Ave., Royal Oak, MI 48067			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name PROSPECT AIRPORT SERVICES		No. Employees, Members 500 or More	Phone No. (Include Area Code) (313) 247-2410
Street Address City, State and ZIP Code Detroit McNamara Terminal, 2507 World Gateway Place, Detroit, MI 48242			
Name 		No. Employees, Members 	Phone No. (Include Area Code)
Street Address City, State and ZIP Code 			
DISCRIMINATION BASED ON (Check appropriate box(es).) <input checked="" type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input checked="" type="checkbox"/> AGE <input checked="" type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify)		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest 06-15-2017 06-15-2017 <input checked="" type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): <p>I began working for the above-named employer in or around October 13, 2015. I was most recently employed as a Lavatory Driver. On or about July 27, 2016, I filed an EEOC Charge of Discrimination (No.: 471-2016-03171) against the employer.</p> <p>In or around November 2016, I resigned as part of a Settlement Agreement reached with the employer. On or about June 15, 2017, I was denied unemployment benefits due to my resignation.</p> <p>I believe I have been denied unemployment benefits in retaliation for filing an EEOC Charge of Discrimination and due to my race, African American, in violation of Title VII of the Civil Rights Act of 1964, as amended, due to my age, 72, in violation of the Age Discrimination in Employment Act of 1967, as amended and due to my disability, in violation of the Americans with Disabilities Act of 1990, as amended.</p>			

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - When necessary for State and Local Agency Requirements	
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.	
SIGNATURE OF COMPLAINANT 		SIGNATURE OF COMPLAINANT 	
Date 08-30-17		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	

MIED ProSe 1 (Rev 5/16) Complaint for a Civil Case

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Willie James Ellis
 Street Address ~~5213~~ 529 E. BROCKTON AVE.
 City and County MADISON HEIGHTS OAKLAND
 State and Zip Code MICHIGAN 48071
 Telephone Number 248-757-9943
 E-mail Address Willieellis44@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name PROSPECT AIR PORT SERVICES
 Job or Title (if known) EMPLOYERS
 Street Address WORLD GATEWAY/2507 MCNAMARA TERR.
 City and County DETROIT WAYNE
 State and Zip Code MICH. 48242
 Telephone Number 734-247-2410
 E-mail Address (if known) -

Defendant No. 2

Name MACAETHUR & MACARTHUR
 Job or Title (if known) LAWYERS
 Street Address 2731 S. ADAMS RD.
 City and County ROCHESTER HILLS MI. ~~48309~~
 State and Zip Code MICH. 48309
 Telephone Number 248-844-9043
 E-mail Address (if known) -

MIED ProSe 1 (Rev 5/16) Complaint for a Civil Case

Defendant No. 3

Name

ARMIN FISHER

Job or Title

ATTORNEY

(if known)

Street Address

20245 W. Twelve Mile Rd.

City and County

Southfield

State and Zip Code

Mich. 48076

Telephone Number

248-354-4444

E-mail Address

(if known)

Defendant No. 4

Name

Job or Title

(if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

(if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM)

I. (a) PLAINTIFFS WILLIE JAMES ELLIS(b) County of Residence of First Listed Plaintiff OAKLAND COUNTY
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

529 E. BROCKTON AVE.MADISON HEIGHTS MI 48071248-757-9943DEFENDANTS PROSPECT AIR PORT SERVICESLEACHOUT SECURITYSTATE OF MI WORKERS COMP.
STATE OF MI UNEMPLOYMENT INS.County of Residence of First Listed Defendant WAYNE COUNTY

(IN U.S. PLAINTIFF CASES ONLY)

Case: 2:17-cv-13852

Judge: Michelson, Laune J.

MJ: Davis, Stephanie Dawkins

Filed: 11-29-2017 At 04:01 PM

CMP WILLIE JAMES ELLIS V PROSPECT AIRPORT SERVICES, ET AL (LGO)

MINI

AY PINE

42

or Plaintiff

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 2 Federal Question (U.S. Government Not a Party)
- ☐ 3 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP (For Diversity Cases Only)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions

CONTRACT	TORTS	PROPERTY RIGHTS	LABOR	IMMIGRATION	OTHER STATUTES
<input checked="" type="checkbox"/> 100 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <input type="checkbox"/> 700 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input checked="" type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

VIOLATION OF CONSTITUTIONAL GUARANTEE PREVENTING ME FROM HAVING FAIR ACCESS TO THE COURT

Brief description of cause:

A TITLE VII OF THE CIVIL RIGHTS ACT OF 1964/AGE DISCRIMINATION 1967

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION DEMAND 5
 UNDER RULE 23, F.R.Cv.P.

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE 11/29/17 SIGNATURE OF ATTORNEY OF RECORD Willie James Ellis

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

PURSUANT TO LOCAL RULE 83.11

1. Is this a case that has been previously dismissed?

☐ Yes

☒ No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

☒ Yes

☐ No

If yes, give the following information:

Court: WORKER COMP. UNEMPLOYMENT INS.

Case No.: _____

Judge: _____

Notes: The COMP AGENCY WON'T LET ME VIEW THE FILE TO GET THE
INFORMATION I NEED. I NEED TIME TO GET INFORMATION FROM
STATE COURT FILES